

Defendant, the Metropolitan Government of Nashville and Davidson County, requests permission to substitute the attached proposed Motion for Summary Judgment for the motion that was previously filed as Docket No. 34. The previously filed motion for summary judgment is incorrectly titled Memorandum of Law in Support of Metropolitan Government's Motion for Summary Judgment. The attached proposed motion contains no substantive changes to the previously filed motion and merely corrects the title of the motion. This substitution of motions will cause no prejudice to Plaintiff and could help alleviate confusion caused by the mistitled pleading.